

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

*In re Cloudflare, Inc.*

PCR Distributing, Co.

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MISC. A. NO. 5:22-mc-51851-MFL-  
APP

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**DECLARATION OF JOHN WILSON IN SUPPORT OF OPERATORS OF  
NHENTAI.NET’S MOTION TO INTERVENE, TO QUASH §512(h) SUBPOENA, FOR  
PROTECTIVE ORDER, AND EMERGENCY MOTION TO STAY DEADLINE**

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I, John T. Wilson, hereby state and declare as follows:

1. I provide this declaration in support of operators of the nhentai.net website (“nhentai.net”) Motion to Intervene, to Quash §512(h) Subpoena, for Protective Order, and Emergency Motion to Stay Deadline.

2. I am currently the managing partner of the law firm of Wilson Whitaker Rynell in Dallas, Texas and am attorney for nhentai.net in the above-referenced matter. I have personal knowledge of the facts stated herein.

3. Cloudflare is aware of nhentai.net’s intention to intervene to prevent release of the information.

4. As of January 5, 2023, the only copyright registration that appears on the U.S. Copyright Office’s website search engine for Movant PCR Distributing, Co. is a one-page filing that Movant in no way indicates is at issue in its Subpoena. Attached hereto as **Exhibit A** is a true and correct copy of the result of search of the U.S. Copyright Office website for PCR Distributing

Co.

5. Attached as **Exhibit B** is a true and correct copy of screenshot of nhentai.net's DNS management page on Cloudflare.

6. According to its website, Cloudflare describes itself as "the phone book of the Internet" - <https://www.cloudflare.com/dns/dnssec/universal-dnssec/> (last visited January 5, 2023).

7. Cloudflare's headquarters are in San Francisco, California and it has no office in this judicial district - <https://www.cloudflare.com/about-overview/> (last visited January 5, 2023).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2023 in Dallas, Texas.

  
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John T. Wilson